

**From:** [Hudson Jobe](#) on behalf of [Hudson Jobe <hjobe@qslwm.com>](#)  
**To:** [Michael Johnson](#)  
**Cc:** [Annette Sanchez](#); [j.schwartzkopf@focusmg.com](#); [Kent Ries](#); [Jason Rae](#); [Rick Cass](#); [Nita Chancellor](#); [Carrie Hurst](#)  
**Subject:** RE: [EXTERNAL] - RE: McClain Case Documents  
**Date:** Tuesday, August 1, 2023 5:34:03 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

---

Thanks – for underwriting, all financial statements and applications submitted by the obligors throughout the loan, and any non-privileged financial analysis.

**Hudson Jobe**

**Board Certified Business Bankruptcy Attorney**

**Texas Board of Legal Specialization**

**[Quilling, Selander, Lownds, Winslett & Moser, P.C.](#)**

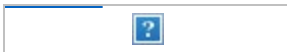
**2001 Bryan Street, Suite 1800, Dallas TX 75201**

**Direct: (214) 880-1858 | Fax: (214) 871-2111**

**Email: [hjobe@qslwm.com](mailto:hjobe@qslwm.com)**

---

**From:** Michael Johnson <MJohnson@rqn.com>  
**Sent:** Tuesday, August 1, 2023 2:21 PM  
**To:** Hudson Jobe <hjobe@qslwm.com>  
**Cc:** Annette Sanchez <ASanchez@rqn.com>; [j.schwartzkopf@focusmg.com](#); Kent Ries <kent@kentries.com>; Jason Rae <jrae@lainfaulkner.com>; Rick Cass <fcass@lainfaulkner.com>; Nita Chancellor <nchancellor@qslwm.com>; Carrie Hurst <churst@RQN.COM>  
**Subject:** [EXTERNAL] - RE: McClain Case Documents



Thanks Hudson.

On the 2004 records responses, yes, we will get those over to you asap.

On the Focus records, perhaps Juanita, who you copied on the email, can send those directly to you. If not, we can send what we have.

On the “underwriting” requests, I am not sure what you are asking for. Can you clarify? We can certainly produce all the loan documents and the payment histories, as well as the Borrowing Base Reports that McClain sent and the AFCID inspection reports that Rabo generated when it inspected its collateral. There are, of course, also internal Rabo documents (for example, credit decisions and credit writeups) but we need to be careful producing those because they contain confidential and proprietary information and also may include privileged communications (it is not uncommon, for example, for an in-house Rabo attorney to show up in those records).

Michael Johnson | Ray Quinney & Nebeker P.C. | 36 South State Street, Suite 1400 | Salt Lake City, Utah 84111

Direct: +1 (801) 323-3363 | Facsimile: +1 (801) 532-7543 | [www.rqn.com](http://www.rqn.com) | [vCard](#)

This email is from a law firm and may contain privileged or confidential information. Any unauthorized disclosure, distribution, or other use of this email and its contents is prohibited. If you are not the intended recipient, please contact the sender and delete this email. Thank you.

---

**From:** Hudson Jobe <[hjobe@qslwm.com](mailto:hjobe@qslwm.com)>

**Sent:** Tuesday, August 1, 2023 1:03 PM

**To:** Michael Johnson <[MJohnson@rqn.com](mailto:MJohnson@rqn.com)>

**Cc:** [j.schwartzkopf@focusmg.com](mailto:j.schwartzkopf@focusmg.com); Kent Ries <[kent@kentries.com](mailto:kent@kentries.com)>; Jason Rae <[jrae@lainfaulkner.com](mailto:jrae@lainfaulkner.com)>; Rick Cass <[fcass@lainfaulkner.com](mailto:fcass@lainfaulkner.com)>; Nita Chancellor <[nchancellor@qslwm.com](mailto:nchancellor@qslwm.com)>

**Subject:** McClain Case Documents

**CAUTION: EXTERNAL EMAIL**

Michael – good talking with you earlier. Per our discussion I would appreciate if you would forward me a copy of all items received by Rabbo in connection with the 2004 discovery and the non-privileged information with/of Focus. I would also appreciate a copy of the original underwriting file as well as any subsequent updates to underwriting.

I have created 3 upload links below. One to use for the 04 exam documents, one for the Focus documents, and another general “other” category for your use in this case to get me large files. Please let me know if you have any issues with using the links. Thanks – hmj

2004 Exam

<https://qslwm.sharefile.com/r-r0104bb786b144971afe70a075c8dc53d>

Focus

<https://qslwm.sharefile.com/r-rb2f18355083b454782230b701b669a49>

Other

<https://qslwm.sharefile.com/r-rf42cf5aceac3495089547625a208aa40>

**Hudson Jobe**

**Board Certified Business Bankruptcy Attorney**

**Texas Board of Legal Specialization**

**Quilling, Selander, Lownds, Winslett & Moser, P.C.**

**2001 Bryan Street, Suite 1800, Dallas TX 75201**

**Direct: (214) 880-1858 | Fax: (214) 871-2111**

**Email: [hjobe@qslwm.com](mailto:hjobe@qslwm.com)**